

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS**

EL PASO DIVISION

In Re:

**PETER FELIX and MARINA FELIX,
Debtor(s).**

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**CASE NO. 16-31028
CHAPTER 13**

**RESPONSE TO MOTION TO DISMISS CHAPTER 13 CASE FILED BY
RREF II CB III-TX TWO, LLC**

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

Come(s) now, **PETER FELIX** and **MARINA FELIX**, Debtors, by and through their attorneys, **MARTINEZ LAW FIRM**, and files this Response to the Motion of **RREF II CB III-TX TWO, LLC**, ("**Movant**"), through its attorney, **STEPHEN P. DROBNY**, with the law firm of **JONES WALKER, LLP**, to Dismiss Case, and could show the Court the following:

I.

Debtors deny the provisions contained in paragraph 1, 2, 3 and 4 of the Motion and demands strict proof thereof.

WHEREFORE, PREMISES CONSIDERED, Debtors pray that after hearing the Motion to Dismiss by **Movant**, be in all things denied, and for such and further relief to which the Court may deem them justly entitled.

DATED this the 29th day of July, 2016.

Respectfully submitted,
MARTINEZ LAW FIRM

/s/ Eric M. Martinez
ERIC M. MARTINEZ
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CERTIFICATE OF SERVICE

I hereby certify that I have mailed/delivered a true and correct copy of the foregoing instrument to Mr. Stuart C. Cox, Chapter 13 Trustee, 1760 N. Lee Trevino, El Paso, TX 79936, to the Debtors, Mr. and Ms. Peter Felix, 11534 Jacquelin Ann, El Paso, TX 79936, to the US Trustee, P.O. Box 1539, San Antonio, TX 78295, and to RREF II CB III-TX TWO, LLC, c/o Stephen P. Drobny, Attorney, 201 Biscayne Blvd., Ste. 2600, Miami, FL 33131, on this the 29th day of July, 2016.

/S/Eric M. Martinez
ERIC M. MARTINEZ